

Remy J. Stocks
Partner
Direct (212) 655-3511
Fax (212) 655-3535
rjs@msf-law.com

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8/15/22

August 12, 2022

Via ECF

Hon. Denise L. Cote
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 906
New York, New York 10007

RE: Trez Capital (Florida) Corporation v. Noroton Heights & Company, LLC, Case No.: 1:20-cy-9622-DLC-BCM

Dear Judge Cote:

We represent Plaintiff-Counterclaim Defendant Trez Capital (Florida) Corporation ("Trez"). Pursuant to Rule 8(B) of Your Honor's Individual Practices, we write to respectfully request that the Court issue an Order approving the accompanying Trez's Memorandum of Law and Declaration of Stephen Meister for filing with redactions in accordance with the Court's instruction to the parties during the August 1, 2022 telephone conference. We have endeavored to redact Trez's submissions only to the extent necessary to protect the information that Defendant-Counterclaimant Noroton Heights & Company, LLC ("Noroton") indicated during the conference was commercially sensitive and/or was the subject of a confidentiality agreement with a third party, in accordance with the Court's instructions.

Trez takes no position on whether the redacted information is in fact confidential or warrants filing under seal under applicable law. Rather, Trez files this letter motion in an effort to comply with the Court's instructions at the conference and in order to fulfill its obligations to Noroton under the parties' Stipulated Confidentiality and Protective Order entered by Judge Nathan on July 23, 2021. See ECF No. 39.

Accordingly, Trez respectfully requests that the Court issue the requested sealing order.

Respectfully submitted,

/s/ Remy J. Stocks

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